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HONORABLE FREDERICK P. CORBIT
Chapter 9

HEARING DATE: THURS., MARCH 7, 2019
HEARING TIME: 2:00 P.M.
LOCATION: 904 W. RIVERSIDE, 3RD FLOOR
RESPONSE DATE: THURS., FEBRUARY 28, 2019

Narendra Ganti, Trust Administrator
of the Kennewick Liquidation Trust

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re

KENNEWICK PUBLIC HOSPITAL
DISTRICT,

Debtor.

No. 17-2025

OMNIBUS OBJECTION TO
CLAIMS AND NOTICE OF
HEARING

TO:

ABILITY NETWORK
AGILENT TECHNOLOGIES, INC.
ALATTAR, FADI
COFFEY COMMUNICATIONS
DEPUY ORTHOPAEDICS, INC.
DEPUY SPINE – JOHNSON & JOHNSON
DEPUY SYTHES SALESS, INC.
FEDEX CORPORATE SERVICES, INC.
MANSOUR, MOUHAMAD
MANSOUR, MOUHAMAD
ORTHOFIX INC.
PSS UROLOGY, INC.
SEIU 1199NW HEALTHCARE
TRYON CLEAR VIEW GROUP, LLC

AND TO:

AND TO:

HEARING DATE:

HEARING TIME:

RESPONSE DUE:

THE CLERK OF THE COURT
THE HONORABLE FREDERICK P. CORBIT
THURSDAY MARCH 7, 2019
2:00 P.M.
THURSDAY, FEBRUARY 28, 2019

OMNIBUS OBJECTION TO CLAIM AND NOTICE OF
HEARING – Page 1

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601 Union St., Suite 5000
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1 LOCATION: 904 W. RIVERSIDE AVENUE, 3RD FLOOR COURTROOM,
2 SPOKANE, WASHINGTON 99201

3 Narendra Ganti, solely in his capacity as the Trust Administrator of the
4 Kennewick Liquidation Trust, has filed an objection to your claim in this bankruptcy
5 case.

6 Your claim may be reduced, modified, or eliminated. You should read these
7 papers carefully and discuss them with your attorney, if you have one.

8 If you do not want the court to eliminate or change your claim, then you or your
9 attorney must file with the Court and or before February 28, 2019 a written response to
10 the objection, explaining your position.

11 If your written response is mailed to the court for filing, you must mail it early
12 enough so that the court will receive it on or before the date stated above; mail to the
13 following address:

14 U.S. Bankruptcy Court Clerk, Room 304, 904 W. Riverside Avenue, Spokane,
15 WA 99201.

16 The above-named creditor/claimant's claim(s) is objected to upon the grounds
17 indicated below:

18 **OBJECTION TO CLAIM**

19 Narendra Ganti, solely in his capacity as the Trust Administrator of the
20 Kennewick Liquidation Trust objects to claims as detailed below and states:

- 21 1. Mr. Ganti files this objection pursuant to Fed. R. Bankr. P. 3007.
- 22 2. On July 27, 2017, the Court entered an order at Docket Entry No. 104,
23 which established December 27, 2017, as the final date by which creditors must file
general unsecured claims.
3. On June 20, 2018, the Court entered an order at Docket Entry No 981,
which confirmed the Debtor's Fourth Amended Plan. On Page 31 of the Court's order,
the Court established that a claim for damages related to a rejection of an executory
contract must be filed on or before thirty days after the effective date of the plan. On

August 3, 2018, the Debtor filed a notice that the plan became effective on that date. Docket Entry No. 1,023. Therefore, a claim for damages related to a rejection of an executory contract was required to be filed on or before September 2, 2018.

3. Mr. Ganti objects to the following claims on the following grounds:

Claimant	Basis for Claim	Amount of Claim	Basis for Objection
Ability Network	Proof of Claim No. 228	\$1,536.00	Untimely. Claim filed on January 8, 2018.
Agilent Technologies, Inc.	Proof of Claim No. 229	\$22,382.36	Untimely. Claim filed on January 30, 2018.
Alattar, Fadi	Proof of Claim No. 170	Unknown	This claim has been satisfied during the course of this case.
Coffey Communications	Proof of Claim No. 242	\$15,000.00	Untimely lease rejection claim. Claim filed October 12, 2018.
DePuy Orthopaedics, Inc.	Listed by the Debtor (Docket Entry No. 93, Page 12)	\$396,094.60	Duplicated by Claim Number 202
DePuy Spine – Johnson & Johnson	Listed by the Debtor (Docket Entry No. 93, Page 12)	\$71,886.75	Duplicated by Claim Number 202
DePuy Sythes Saless, Inc.	Listed by the Debtor (Docket Entry No. 93, Page 12)	\$113,406.31	Duplicated by Claim Number 202
FedEx Corporate Services, Inc.	Proof of Claim No. 236	\$11,101.85	Untimely. Claim filed on July 2, 2018.

Claimant	Basis for Claim	Amount of Claim	Basis for Objection
Mansour, Mouhamad	Proof of Claim No. 171	Unknown	This claim has been satisfied during the course of this case.
Mansour, Mouhamad	Proof of Claim No. 177	Unknown	This claim has been satisfied during the course of this case. Additionally, it duplicates Proof of Claim No. 171.
Orthofix Inc.	Proof of Claim No. 231	\$3,800.00	Untimely. Claim filed on April 17, 2018.
PSS Urology, Inc.	Proof of Claim No. 241	\$17,496.39	Untimely. Claim filed on September 4, 2018.
SEIU 1199NW Healthcare	Proof of Claim No. 216	Unknown	This claim has been satisfied during the course of this case.
Tryon Clear View Group, LLC	Proof of Claim No. 230	\$36,614.00	Untimely. Claim filed on February 8, 2018. Further, there are no documents to support the claimed amount.

Therefore, the Trustee objects to the Claims listed above and requests disallowance of the same.

DATED this 30th day of January, 2019.

BUSH KORNFELD LLP

By /s/ Thomas A. Buford
Thomas A. Buford, WSBA #52969
James L. Day, WSBA #20474

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Administrator of the Kennewick
Liquidation Trust